

CHELMSFORD LOCAL PLAN EXAMINATION

Matter 9 – The Environment (Week 3)

Hearing Statement of the Campaign to Protect Rural England - Essex Branch

Main issues – Does the Plan set out a positively prepared strategy for conserving and where appropriate enhancing the natural, built and historic environment that is justified, effective and consistent with national policy?. Does it adequately address climate change and other environmental matters and are the policies sound?

Countryside Policies - Strategic Policy S13 and Policies CO1-CO8

Green Belt

84. Strategic Policy S13 includes seeking to protect Green Belt from inappropriate development. Policy CO1 echoes this but also adds 'except in very special circumstances.' Policy CO2 sets out criteria for new buildings or structures within the Green Belt. Policy CO5 sets out criteria for infilling in the Green Belt. Policy CO6 provides criteria for changes of use and engineering operations. Policy CO7 identifies criteria for extensions to existing buildings in the Green Belt. Policy CO8 sets out criteria for rural and agricultural/forestry workers' dwellings. Are these policies consistent with national policy on Green Belt? If not what changes are necessary to make them compliant? Is it necessary to repeat national policy in the Plan?

1. The Campaign to Protect Rural England (CPRE) fully supports the aims of Strategic Policy S13 and Policy CO1 in seeking to protect the Green Belt from inappropriate development. However, the CPRE feels that this essential objective of Green Belt designation is seriously undermined by the allocation at SGS2 of 800 new homes on land which is located directly abutting the open northern border of the Metropolitan Green Belt (MGB). To enclose this part of the MGB with such a significant level of new development appears to devalue its designation and, although the proposed development is not actually located within the designated area, the immediate proximity and relationship can be construed as a failure in protecting the MGB against "inappropriate development".

2. In this respect, CPRE considers there to be an inconsistency with paragraph 79 of the NPPF, which states clearly that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

3. Such a large development on the very northern fringe of the designated MGB would make a large inroad into the open nature of the landscape between Writtle and the outskirts of Chelmsford. It could also be a first step to ribbon development along the A1060, which forms the de facto northern

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boundary of the MGB throughout the Chelmsford District and further west. The proposed growth at West Chelmsford is therefore not in keeping with the rural nature of this location and impinges too greatly on the importance of maintaining the openness of countryside that Green Belt policy aims to achieve.

Green wedges and green corridors

86. Are the criteria for green wedges and green corridors set out in Policies CO3, CO5, CO6, CO7 and CO8 justified, effective and consistent with national policy?

4. Policy CO1 states that Green Infrastructure assets will be protected and enhanced as valued and multi-faceted landscapes for their openness and function as important green networks for wildlife, leisure and recreation, and for increased public access and enjoyment. Development which materially harms the role, function, character and appearance of this valued landscape will be resisted.

5. However, just as SGS2 is located adjacent to the Green Belt boundary, it also abuts an identified Green Wedge. CPRE suggests that the proposed allocation of a very large development in this sensitive location is particularly unsuitable given the close proximity to both designated MGB and the proposed Green Wedge between Writtle and the urban area. The creation of a large urban extension into countryside directly adjacent to two major environmental protection designations is counter-productive and would place too much strain on the adjacent Green Wedge. This is completely at odds with the stated objectives of Policy CO1 and thereby undermines the soundness and credibility of the Plan as a whole.

Rural areas

87. Does the Plan clearly define what the Rural Areas are?

88. Strategic Policy S13 states that there are '*further areas within the countryside that are sensitive to change...*'. What are these areas and is it clear how a decision-maker will consider development proposals within them? It also identifies that other areas of the countryside, including recognised areas of ecological, historic and functional importance will also be protected from inappropriate development? What is meant by '*inappropriate development*' in this context?

89. Are the criteria for rural areas set out in Policy CO4, CO5, CO6, CO7 and CO8 justified, effective and consistent with national policy?

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6. CPRE does not believe that the Rural Areas are clearly defined in the Plan neither is the Role of the Countryside (SP13). Inter alia, a fundamental role of the countryside, which the Plan overlooks, is in food and other crop production. The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The Agricultural Land Classification system provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system.

7. The majority of the farmland within the District is almost entirely Grade 2 or Grade 3 and falls within the description "Best and Most Versatile" (BMV). The Plan contains little to no information on the management of BMV agricultural land nor on the preference for lower quality agricultural land being identified for development. The CPRE therefore questions whether the plan does enough to safeguard the long term capability of BMV land as a resource for the future. In this respect, the CPRE would like to see an expressed presumption against development on this quality of farmland except in very exceptional circumstances and then only on a small scale. The lack of any reference to the need to maintain the best and most productive agricultural land from development is a serious omission in the Plan as the focus is entirely set on protection criteria related to other national planning policy objectives (eg Green Belt and other recognised areas of ecological, landscape or historic value).

8. Cumulatively, the proposed level of development in the Plan will result in the loss of a substantial amount of greenfield land and this include much Grade 2 or Grade 3 agricultural land. In this respect, in its previous representations, the CPRE has argued against the proposal for 800 dwellings at the West Chelmsford location which is wholly on Grade 2 farmland. Not only should this be preserved for the UK's food production needs, but this is also open countryside with wide views that would be destroyed by the proposed development. The Plan should aim to ensure that high grade agricultural land is maintained for food production to feed the expanding population and to prevent the over reliance on imports. In this respect, it is not consistent with national policy and thereby unsound.

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Climate change and other environmental matters

96. Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Does the Plan comply with this requirement?

9. At the strategic level, CPRE has strong views regarding the overarching emphasis on growth within the Plan and considers this to be inherently unsustainable in the light of the the landmark report by the United Nations Intergovernmental Panel on Climate Change (IPCC) released in October 2018 - warning that climate change is occurring earlier and more rapidly than expected and highlighting the urgent need for climate change mitigation to be tackled at the local level. The allocation of prime agricultural land for the provision of large residential developments predominantly for those who already have homes (in London and other parts of the South East) and who seek more affordable locations, added together with the new infrastructure requirements associated with the developments and longer travel to work patterns, will only make it harder to achieve global warming targets.